Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Implementing Kari's Law and Section 506 of RAY BAUM'S Act	)	PS Docket No. 18-261
	)	
	)	
Inquiry Concerning 911 Access, Routing and Location in Enterprise Communications Systems	)	PS Docket No. 17-239
	)	

REPLY COMMENTS OF WEST SAFETY SERVICES, INC.

West Safety Services, Inc. ("West Safety") (f/k/a Intrado Inc.) respectfully submits these brief reply comments in response to the Commission's Notice of Proposed Rulemaking in the above-referenced proceeding.[1]

Provider, public safety and state government commenters generally agree on the need and feasibility of federal rules establishing a benchmark level of dispatchable location for 9-1-1 calls from multi-line telephone systems (MLTS).[2] Although further discussion may be warranted regarding 9-1-1 dispatchable location support for other communications services including SMS, nomadic interconnected VoIP and interconnected outbound-only VoIP, the record in this proceeding and the ECS NOI support adoption of the Commission's proposed rules on notification and dispatchable location for MLTS calls to 9-1-1. West Safety therefore encourages the Commission to issue an order adopting its proposed 9-1-1 rules for MLTS and as

[1] *Implementing Kari's Law and Section 506 of RAY BAUM'S Act*, PS Docket Nos. 18-261 and 17-239, Notice of Proposed Rulemaking, FCC 18-132 (Sept. 26, 2018) ("NPRM").

[2] *See, e.g.*, NENA Comments at 5-6; MESB Comments at 3; The Texas 9-1-1 Entities Comments at 4; Bandwidth Comments at 10; Cisco Comments at 19; Comtech Comments at 3; RedSky Comments at 19; State of Florida, Dept. of Management Services, DIVTEL, Bureau of Public Safety Comments at 1; APCO Comments at 3.

necessary, initiate a Further Notice of Propose Rulemaking to examine the remaining issues in the NPRM in greater detail.

West Safety believes the Commission can and should craft a complete 9-1-1 MLTS location rule covering all MLTS users by requiring (i) dispatchable location for all on-premises users and, if technically feasible, all off-premises users, and (ii) fallback location for off-premises MLTS users to best available location information (*e.g.*, user validation (prompts), network history, GPS, WiFi AP) when dispatchable location is not technically feasible. The rapid growth in distributed workforces compels comprehensive MLTS 9-1-1 regulation. Large percentages of the modern enterprise workforce now telecommute or operate outside the traditional headquarters at satellite offices or offsite locations.[3] This trend will accelerate over the next few years as organizations increase their reliance on remote workers.

The impact on E9-1-1 services for remote workers is significant because office phones can be located anywhere there is an Internet connection. Without proper E9-1-1 solutions in place, remote employees using a virtual private network (VPN) can make calls that appear to be originated from an employer's main office thousands of miles away from the caller's home office. The consequences of even simple and unintended configuration mistakes in routing or location provisioning for 9-1-1 calls can be severe for teleworkers.

As a vendor of 9-1-1 solutions for a wide variety of MLTS and VoIP and Unified Communications (UC) systems, West Safety has found that modern IP-based MLTS and VoIP/UC platforms are capable of supporting accurate 9-1-1 location provisioning for MLTS users. These low-cost vendor solutions enable automatic tracking of all MLTS on-premises users (including soft phones and Wi-Fi enabled mobile devices) and near-automatic tracking of

[3] West Safety ECS NOI Comments at 9-10, fn. 25, PS Dkt. No. 17-239 (filed Nov. 15, 2017).

MLTS off-premises users through automatic detection of location changes and pre-population of location based on network history or user prompts. Many of West Safety's customers have remote workers that are easily supported over home or public broadband connections outside the enterprise, and numerous other providers of MLTS 9-1-1 services offer similar applications for mobile soft phone users.[4]

If the Commission favors adoption of MLTS 9-1-1 notification and location rules only for on-premises MLTS, West Safety recommends the rule's service/category distinction address on-premises MLTS *users* not on-premises/on-site MLTS *equipment* or *services*. Recent trends in enterprise voice suggest many companies are transitioning to fully hosted solutions that do not require on-premises PBX equipment or SIP trunks. In no circumstances should these fully hosted/cloud PBX solutions be exempt from the 9-1-1 MLTS rule if the voice system is serving on-premises users. Additionally, the term "on-premises" should be defined carefully and broadly to include the full range of enterprise network deployments and facilities/properties (*i.e.*, not just the main campus/headquarters where the MLTS is installed). Furthermore, MLTS owners, operators and/or managers should not be permitted to claim exemption from on-premises MLTS 9-1-1 rules simply because they have ceded control of their voice network to a hosted network provider/manager. If the MLTS user is on-premises, 9-1-1 notification and dispatchable location should always be required and supported.

West Safety agrees with and supports the comments of the Association of Public-Safety Communications Officials-International, Inc. (APCO) characterizing dispatchable location as the gold standard for public safety.[5] Timely delivery of verified dispatchable location should be the

[4] *Id.* at 9-10.

[5] APCO Comments at 3.

expectation for all communications services capable of calling 9-1-1. Although West Safety endorses RAY BAUM Act's flexible definition of dispatchable location without specific granularity requirements for MLTS, we believe some minimum baseline requirement of dispatchable location (*i.e.*, street address and any additional information necessary to adequately identify the location of the calling party) should be included in the Commission's rules to ensure predictability for public safety and provider diligence and compliance. Replacing dispatchable location with best available location risks introducing inconsistency to the localized nature of 9-1-1 and PSAP operations and unrestrained provider discretion inappropriate for emergency response.[6]

For the reasons explained above and in West Safety's initial comments, West Safety respectfully requests the Commission adopt its proposed 9-1-1 notification and dispatchable location requirements for MLTS and as necessary, initiate a Further Notice of Proposed Rulemaking to examine the technical feasibility of dispatchable location support for other communications services addressed in the NPRM.

Dated: February 8, 2019

Respectfully submitted,

/s/Mary Boyd
Mary Boyd, VP, Regulatory and Government Affairs
West Safety Services, Inc.
1601 Dry Creek Drive
Longmont, CO 80503
mary.boyd@west.com
Phone: 720-494-5971
Fax: 720-494-6600

/s/Sean M. Ward
Sean M. Ward
Associate Counsel
West Corporation
1601 Dry Creek Drive
Longmont, CO 80503
sward@west.com
Phone: 720-864-5510
Fax: 720-494-6600

[6] In addition to dispatchable location, West Safety supports the conveyance of reliable supplemental information and other forms of location data that may be helpful to the PSAP such as proximity checked GPS or Wi-Fi Access Points (Wi-Fi AP). However, validated dispatchable location remains the location backbone for public safety response. Next best location alternatives to dispatchable location should be permitted only in the limited circumstances where dispatchable location is unavailable or not technically feasible.